

# Nevada Division of Environmental Protection Chemical Accident Prevention Program Element Audit Checklist



| Fac                                  | acility: Process(es) Covered: Date: |  |                   |               |  |
|--------------------------------------|-------------------------------------|--|-------------------|---------------|--|
| II. PROCESS SAFETY INFORMATION (PSI) |                                     |  |                   |               |  |
| A. RECORDS AUDIT/REVIEW              |                                     |  |                   |               |  |
| 1)                                   | EXISTENCE, C                        | OMPLETENESS OF PSI   |                   | 1             |  |
| a.                                   | Compliance of I                     | acility Program with Specific Code Requirements  | NAC Ref.          | Resp.<br>Code |  |
| i.                                   |                                     | ear to be complete for the covered process and/or subprocess (i.e. the s 2 through 6 are satisfied)?             | 459.95412         |               |  |
| ii.                                  |                                     | ocated on site and available to employees (in addition to items 2 through 6, n-Site Inspection)?                 | 459.95412         |               |  |
| b.                                   | Potential Enhan                     | cements to Facility Program  |                   | Resp.<br>Code |  |
| i.                                   | Is the PSI organiz                  | red and readily accessible?  |                   |               |  |
| 2)<br>a.                             |                                     | N PERTAINING TO HAZARDS OF SUBSTANCES Cacility Program with Specific Code Requirements                           | NAC Ref.          | Resp.         |  |
| i.                                   |                                     | ty data sheets (MSDS) or other substance hazard information on site for all                                      | 459.95412(2a)     | Couc          |  |
| ii.                                  | Does the substand<br>MSDS Summary   | the hazard information include all relevant hazard information (refer to Form)?                                  | 459.95412(2a)     |               |  |
| b.                                   | Potential Enhan                     | cements to Facility Program  |                   | Resp.<br>Code |  |
| i.                                   | Is the hazardous                    | substance information compiled in an organized fashion, such as in an indexed                                    | d notebook?       |               |  |
| ii.                                  |                                     | substance information available in a location or several locations to provide ea<br>ay require such information? | asy access to all |               |  |
| Note                                 | es/Comments Pertai                  | ning to Responses to Questions under Issue 2):   |                   |               |  |



| a.     | Compliance of Facility Program with Specific Code Requirements  | NAC Ref.       | Resp.<br>Code |
|--------|---|----------------|---------------|
| i.     | Has a block flow or simplified Process Flow Diagram been developed?   | 459.95412(2b1) |               |
| ii.    | Does Flow Diagram accurately cover the extent of regulated process ?  | 459.95412(2b1) |               |
| iii.   | Does a Process Chemistry description exist for current process?   | 459.95412(2b2) |               |
| iv.    | Does Process Chemistry describe chemical reactions for primary & secondary reactions?   | 459.95412(2b2) |               |
| v.     | Does Process Chemistry describe the type and nature of catalysts used?  | 459.95412(2b2) |               |
| vi.    | Does Process Chemistry describe competing side reactions?   | 459.95412(2b2) |               |
| vii.   | Does Process Chemistry describe undesirable chemical reactions such as decompositions and autopolimerizations?                            | 459.95412(2b2) |               |
| viii.  | Is the maximum intended onsite inventory defined?   | 459.95412(2b3) |               |
| ix.    | Is a Safe Upper Limit for process Pressure(s), along with the basis, defined and consistent with design criteria defined in section 4?    | 459.95412(2b4) |               |
| х.     | Is a Safe Lower Limit for process Pressure(s), along with the basis, defined and consistent with design criteria defined in section 4?    | 459.95412(2b4) |               |
| xi.    | Have the Consequences of Deviating outside the Pressure limits been evaluated?  | 459.95412(2b5) |               |
| xii.   | Is a Safe Upper Limit for process Temperature(s), along with the basis, defined and consistent with design criteria defined in section 4? | 459.95412(2b4) |               |
| xiii.  | Is a Safe Lower Limit for process Temperature(s), along with the basis, defined and consistent with design criteria defined in section 4? | 459.95412(2b4) |               |
| xiv.   | Have the Consequences of Deviating outside the Temperature limits been evaluated?   | 459.95412(2b5) |               |
| XV.    | Is a Safe Upper Limit for process Flow(s), along with the basis, defined and consistent with design criteria defined in section 4?        | 459.95412(2b4) |               |
| xvi.   | Is a Safe Lower Limit for process Flow(s), along with the basis, defined and consistent with design criteria defined in section 4?        | 459.95412(2b4) |               |
| xvii.  | Have the Consequences of Deviating outside the Flow limits been evaluated?  | 459.95412(2b5) |               |
| xviii. | Are Stream Composition Limits, along with the basis, defined and consistent with design criteria defined in section 4?                    | 459.95412(2b4) |               |
| xix.   | Have the Consequences of Deviating outside the Composition Limits been evaluated?   | 459.95412(2b5) |               |
| XX.    | Are minimum pipe and vessel wall thickness, along with the basis, defined and consistent with design criteria defined in section 4?       | 459.95412(2b4) |               |
| xxi.   | Are instrument calibration tolerances defined and consistent with design criteria defined in section 4?                                   | 459.95412(2b4) |               |
| xxii.  | Are rotating equipment tolerances, such as vibration limits, defined and consistent with design criteria defined in section 4?            | 459.95412(2b4) |               |



| xxiii.  | ii. Are other process or mechanical limits defined and consistent with design criteria defined in section 4?  459.95412(2b4) |                |               |
|---|--|----------------|---------------|
| xxiv.   | Have the Consequences of Deviating outside the limits established under xx through xxiii been evaluated?                     | 459.95412(2b5) |               |
| b.  | Potential Enhancements to Facility Program   |                | Resp.<br>Code |
| i.  | i. Is Process Chemistry written to be understandable to operations personnel or others that may need this information?       |                |               |
| ii.   | Is a minimum required on-site inventory defined?   |                |               |
| Notes/Comments Pertaining to Responses to Questions under Issue 3): |  |                |               |

## 4) INFORMATION RELATED TO THE EQUIPMENT OF THE PROCESS

| a.    | Compliance of Facility Program with Specific Code Requirements   | NAC Ref.       | Resp.<br>Code |
|-------|--|----------------|---------------|
| i.    | Have comprehensive equipment and piping lists been developed, or if a piping list has not been developed, is the piping specification clearly noted for each line on the P&ID?                     | 459.95412(2c1) |               |
| ii.   | Have equipment & piping materials been evaluated for compatibility with process fluids?  | 459.95412(2c1) |               |
| iii.  | Have design parameters (i.e. temperature, pressure, etc) been determined for equipment and piping; and is the equipment and piping capable of handling the maximum and minimum process conditions? | 459.95412(2c1) |               |
| iv.   | Have comprehensive instrument lists been developed?  | 459.95412(2c1) |               |
| v.    | Have instruments been evaluated for compatibility with process fluids?   | 459.95412(2c1) |               |
| vi.   | Have design parameters (i.e. temperature, pressure, etc) been determined for instruments; and are instruments capable of handling the maximum and minimum process conditions?                      | 459.95412(2c1) |               |
| vii.  | Do Piping & Instrument Diagrams (P&IDs) cover the entire regulated process, including process auxiliary systems and utilities?   | 459.95412(2c2) |               |
| viii. | Do P&IDs contain all process equipment and piping?   | 459.95412(2c2) |               |
| ix.   | Do P&IDs contain all instrumentation?  | 459.95412(2c2) |               |
| x.    | Is control logic readily evident from the P&ID, or if not, is control logic documented in a separate format such as ladder logic diagrams, wiring schematics, SAFE charts?                         | 459.95412(2c2) |               |
| xi.   | Has P&ID and control logic accuracy been confirmed by the facility?  | 459.95412(2c2) |               |
| xii.  | Have Electrically Hazardous Areas, defined pursuant to Article 500 of the National Electric Code, been defined?  | 459.95412(2c3) |               |



| iii.   | Are Electrically Hazardous Areas identified on a plot plan and in elevation or detail views as n   | ecessary?      |               |
|--------|--|----------------|---------------|
| ii.    | Is original installation date and purchase orders available for all piping, equipment and instruments?   |                |               |
| i.     | Do P&IDs show equipment names and informational summary along top or bottom borders (i.e. Pressure Vessel Name, MAWP @ Temp, Vessel Dimensions; Pump Name, Capacity, Differential Head; etc.)?                               |                |               |
| b.     | Potential Enhancements to Facility Program   |                | Resp.<br>Code |
| xxvi.  | Do Heat & Material Balances show, at a minimum: stream pressure, temperature, composition (incl. minor concentrations of toxics and corrosives), state and physical properties (such as molecular wt., density, viscosity)?  | 459.95412(2c7) |               |
| XXV.   | Do Heat & Material Balances exist for the regulated process (not mandatory if the process was built before May 26, 1992)?  | 459.95412(2c7) |               |
| xxiv.  | Does the building Ventilation System meet Uniform Fire Code requirements?  | 459.95412(2c5) |               |
| xxiii. | If building Ventilation System includes a scrubber for toxic or highly toxic compressed gases, does it meet rqmts of Uniform Fire Code, Article 80 (section 8003.3.1.3.5)?   | 459.95412(2c5) |               |
| xxii.  | Is there documentation verifying that the building Ventilation System configuration and capacity are adequate?   | 459.95412(2c5) |               |
| xxi.   | Has the required capacity of the building Ventilation System, as required by the Uniform Fire Code, been evaluated?  | 459.95412(2c5) |               |
| XX.    | For regulated processes enclosed by a building, has the capacity of the mechanical Ventilation Systems been determined?  | 459.95412(2c5) |               |
| xix.   | Have pressure relief headers and associated flares or scrubbers been evaluated for adequate capacity, and has the capacity been determined to be adequate?   | 459.95412(2c4) |               |
| xviii. | Has process been evaluated to determine if additional Pressure Relief Devices are required?  | 459.95412(2c4) |               |
| xvii.  | Have actual Pressure Relief Device pressure settings and capacities been determined to be adequate?  | 459.95412(2c4) |               |
| xvi.   | Have required relief pressures, rates and sizing basis (i.e. process upset, fire or thermal relief) been determined for each corresponding Pressure Relief Device listed in xv above?  | 459.95412(2c4) |               |
| XV.    | Have all Pressure Relief Devices been listed with the following information from the actual valve: set pressure and capacity @ defined overpressure (taken from valve nameplate or from vendor data traceable to the valve)? | 459.95412(2c4) |               |
| xiv.   | Have control rooms and other buildings within Electrically Hazardous Areas been evaluated for compatibility with the electrical classification and found to be compatible?   | 459.95412(2c3) |               |
| xiii.  | Have all electrical components & equipment within defined Electrically Hazardous Areas been evaluated for compatibility with the electrical classification, and found to be compatible?                                      | 459.95412(2c3) |               |

Revision: 0, December 22, 1999



Notes/Comments Pertaining to Responses to Questions under Issue 4):

| 5)    | DESCRIPTION OF SAFETY SYSTEMS AND THEIR FUNCTIONS   | ı                  | 1            |
|-------|---|--------------------|--------------|
| a.    | Compliance of Facility Program with Specific Code Requirements  | NAC Ref.           | Resp<br>Code |
| i.    | Has a Safety System Description, SSD, been developed and does it include the applicable portions of sections iii through xiii below?                          | 459.95412(2c8)     |              |
| ii.   | Does SSD appear to be complete based on review of Process or Block Flow Diagram, P&ID and/or on-site inspection?  | 459.95412(2c8)     |              |
| iii.  | If process is covered by an Emergency Shut-Down System, is it discussed in the SSD?   | 459.95412(2c8)     |              |
| iv.   | If the process area has Toxic Gas Sensors, are they discussed in the SSD?   | 459.95412(2c8)     |              |
| v.    | If the process area has Combustible Gas Sensors, are they discussed in the SSD?   | 459.95412(2c8)     |              |
| vi.   | If the process area has Flame Detectors, are they discussed in the SSD?   | 459.95412(2c8)     |              |
| vii.  | If the process has a Firewater System, is it discussed in the SSD?  | 459.95412(2c8)     |              |
| viii. | If the process has an Emergency Generator, is it discussed in the SSD?  | 459.95412(2c8)     |              |
| ix.   | If the process has an Uninterruptible Power Supply, UPS, is it discussed in the SSD?  | 459.95412(2c8)     |              |
| X.    | If the process has a Flare System, Incinerator or Vent Scrubber, is it discussed in the SSD?  | 459.95412(2c8)     |              |
| xi.   | If there are audible or visual Alarms, are they discussed in the SSD?   | 459.95412(2c8)     |              |
| xii.  | If the process has an associated building Ventilation System, is it discussed in the SSD?   | 459.95412(2c8)     |              |
| xiii. | Are there other safety systems (list below)? If so, are they discussed in the SSD?  | 459.95412(2c8)     |              |
| b.    | Potential Enhancements to Facility Program  |                    | Resp<br>Code |
| i.    | Has a plot plan been developed that illustrates the location of the various sensors, detectors an as identified in the SSD?                                   | d safety equipment |              |
| ii.   | Has a plot plan been developed that illustrates the fire water system layout, including header latank, hydrant and monitor location as identified in the SSD? | ayout and pump,    |              |
| ii.   | Has a single line electrical diagram been incorporated into the SSD that delineates what source emergency power generation?                                   | es are supplied by |              |
| v.    | Has a diagram or list of sources powered by the UPS system been provided, with an estimate of   | of battery life?   |              |
| v.    | Has a chart been developed that describes what initiates an Emergency Shutdown and describ actions?   | es the subsequent  |              |



| Notes/Comments Pertaining to Responses to Questions under Issue 5): |   |                  |               |  |  |
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| 6)  | EVALUATION OF CODE APPLICABILITY AND COMPLIANCE   |                  | I             |  |  |
| a.  | Compliance of Facility Program with Specific Code Requirements  | NAC Ref.         | Resp.<br>Code |  |  |
| i.  | Have all applicable codes and specifications been defined by the facility (refer to PSI data forms)?  | 459.95412(2c6)   |               |  |  |
| ii.   | Has code compliance been evaluated by the facility (refer to PSI data forms)?   | 459.95412(3&4)   |               |  |  |
| iii.  | Have code deficiencies been corrected?  | 459.95412(3&4)   |               |  |  |
| b.  | Potential Enhancements to Facility Program  |                  | Resp.<br>Code |  |  |
| i.  | For facilities 'grand fathered' into earlier versions of codes, has an evaluation of compliance version of the codes been conducted?            | with the current |               |  |  |
| ii.   | For facilities 'grand fathered' into earlier versions of codes, if deficiencies with respect to curidentified, were the deficiencies corrected? | rent codes were  |               |  |  |
| Note  | es/Comments Pertaining to Responses to Questions under Issue 6):  |                  |               |  |  |
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| General Records Audit/Review Notes/Comments: |  |
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II-7



|   | B. ON-SITE INSPECTION   |   |         |   |       |                |     |
|---|---|---|---------|---|-------|----------------|-----|
| 1)  | 1) VERIFY THAT PSI IS ONSITE, ACCESSIBLE AND CURRENT                                      |   |         |   | Re    | sp. C          | ode |
| a.  | a. Are MSDS sheets or hazardous substance information on site and available to employees? |   |         |   |       |                |     |
| b.  | Are block flow or pr  | rocess flow diagrams, and process chemistry available to employees?         |         |   |       |                |     |
| c.  | Are P&IDs available   | e to employees?   |         |   |       |                |     |
| d.  | Are piping, equipme   | ent and instrument specifications available to employees that must use the  | hem?    |   |       |                |     |
| e.  | Is electrical hazardo information?  | us area classification information available to employees that must use     | the     |   |       |                |     |
| Notes/Comments Pertaining to Responses to Questions under Issue 1):  2) SELECT AT LEAST ONE P&ID FOR FIELD VERIFICATION                           |   |   |         |   |       |                |     |
|   | LIST SELECTED   | P&ID(s) ON THE FOLLOWING TABLE:   |         |   |       |                |     |
| #   | P&ID<br>NUMBER  | DRAWING TITLE   | Revisio | n | R     | evisio<br>Date | n   |
| i   |   |   |         |   |       |                |     |
| ii  |   |   |         |   |       |                |     |
| iii   |   |   |         |   |       |                |     |
| iv  |   |   |         |   |       |                |     |
|   |   | Inquiry/Observation   |         | F | Resp. | Code           | :   |
|   | (Hi   | ghlight items on P&ID as they are verified in field)                        |         | i | ii    | iii            | iv  |
| a.  | Do the piping and p   | iping components match the drawing?   |         |   |       |                |     |
| b.  | Does a spot check of  | f flanges, fittings and valves indicate conformance to piping specification | ons?    |   |       |                |     |
| c. Do the pressure vessels, pumps, compressors, heat exchangers and other equipment match the drawing?  |   |   |         |   |       |                |     |
| d. Does spot check of pressure vessels, pumps, compressors, heat exchangers and other equipment indicate conformance to equipment specifications? |   |   |         |   |       |                |     |
| e.  | Do instruments mate   | ch the drawing?   |         |   |       |                |     |
| f. Does spot check of instruments indicate conformance to instrument specifications?  |   |   |         |   |       |                |     |



| g.    | Does control logic documentation exist where needed to verify logic shown on the drawing?   |   |          |     |
|-------|---|---|----------|-----|
| h.    | Does labeling on process pipe, equipment and instruments appear adequate?   |   |          |     |
| Notes | s/Comments Pertaining to Responses to Questions under Issue 2):   |   |          |     |
| 3)    | VERIFY OTHER PSI INFORMATION  | ] | Resp. Co | ode |
| a.    | From a spot check of electrical components (such as motors, enclosures and instruments) in electrically hazardous locations, does it appear that the components comply with the location? | 7 |          |     |
| b.    | From a field review of the systems in the Safety System Description, does the description appear accurate and complete?   |   |          |     |
| Notes | s/Comments Pertaining to Responses to Questions under Issue 3):   |   |          |     |
| Gene  | eral On-Site Inspection Notes/Comments:   |   |          |     |

# C. INTERVIEWS

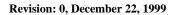


| 1) | SELECT AT LEAST ONE OPERATING AND ONE MAINTENANCE PERSON TO INTERVIEW |
|----|---|
|    | REGARDING THE EFFECTIVENESS OF PSI USING THE FOLLOWING QUESTION SETS. |
|    | (RESPONSES ARE TO BE LOGGED ON FOLLOWING PAGES.)                      |

| Question<br>Set | Question Options/Phrasing  |
|-----------------|--|
| a               | What is your responsibility?   |
| b               | Do you use process flow diagrams or piping & instrument diagrams on your job? If so, how do you use them?      |
| с               | Do you use piping, equipment, instrument or electrical specifications on your job? If so, how do you use them? |
| d               | Do you refer to the safety system description on your job?<br>If so, how do you use it?                        |

# C. INTERVIEWS 2) RECORD RESPONSES OF SELECTED OPERATING OR MAINTENANCE PERSONNEL TO QUESTIONS FROM THE QUESTION SETS Employee Profile Job Title/Position Department/Unit/Group Yrs in Job w/Co.

### **Response to Question Set \_:**





| Response to Question Set _: |  |
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| Response to Question Set _: |  |
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| Response to Question Set _: |  |
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